

EXHIBIT B

CURE NOTICE

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

KIROMIC BIOPHARMA, INC.,

Debtor.

Chapter 7

Case No. 25-10552 (MFW)

**NOTICE OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES THAT MAY BE
ASSUMED AND ASSIGNED, PURSUANT TO SECTION 365 OF THE BANKRUPTCY
CODE, IN CONNECTION WITH THE SALE OF THE SUBSTANTIALLY ALL OF
ESTATE'S ASSETS, AND THE PROPOSED CURE AMOUNTS**

PLEASE TAKE NOTICE OF THE FOLLOWING:

1. On April 4, 2025, Jeffrey L. Burtch, Chapter 7 Trustee (the “Trustee”) for the bankruptcy estate of the above-captioned debtor, filed a *Motion for Entry of Order (A) Approving Asset Purchase Agreement Pursuant to 11 U.S.C. § 363 and (B) Granting Related Relief* (the “Motion”).

2. In accordance with the Motion, the Trustee hereby files this Notice (the “Cure Notice”) identifying: (i) those executory contracts and unexpired leases that may be assumed and assigned to a potential purchaser in connection with the Trustee’s sale of the Purchased Assets (the “Executory Contracts and Unexpired Leases”); and (ii) the proposed cure amount to cure any and all defaults associated with each Executory Contract and Unexpired Lease (the “Cure Amount”).

3. A list of the Executory Contracts and Unexpired Leases, together with the Cure Amount for each, is attached to this Cure Notice as Exhibit 1.

4. You have been identified as possibly being a party to an Executory Contract or Unexpired Lease.

5. Timely objections to the Trustee’s proposed Cure Amounts, if any, will be heard at a hearing scheduled to take place on April ____, 2025 at ____:00 .m. (ET) before the Honorable Mary F. Walrath, United States Bankruptcy Judge, at the United States Bankruptcy Court for the District of Delaware, Courtroom No. 4, 5th Floor, 824 North Market Street, Wilmington, Delaware 19801.

6. **If you wish to assert an objection to the proposed Cure Amount associated with the particular Executory Contract or Unexpired Lease to which you are a party, you must do so in accordance with the instructions in this Cure Notice, on or before 5:00 p.m. Eastern Time, April ____, 2025 (the “Objection Deadline”).**

7. In order to be considered, objections (if any) must: (i) be in writing; (ii) state with specificity the grounds for such objection (with appropriate documentation in support thereof);

(iii) comply with the Federal Rules of Bankruptcy Procedure and the Local Rules for the United States Bankruptcy Court for the District of Delaware; (iv) be filed with the Bankruptcy Court, 824 N. Market Street, 3rd Floor, Wilmington, DE 19801 by the Objection Deadline; and (v) be served on the following parties (so as to be received by such parties) by the Objection Deadline: (i) the Trustee, care of his counsel, Cozen O'Connor, 1201 N. Market St., Ste. 1001, Wilmington, DE 19801, Attn. Mark E. Felger, Esq.; (ii) the Buyer, care of its counsel, Steptoe LLP, 2029 Century Park East, Suite 980 Los Angeles, CA 90067, Attn. Jeffrey Reisner, Esq.; and (iii) the Office of the United States Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19081.

8. If you do not file and serve a timely objection to a proposed Cure Amount listed on Exhibit 1 to this Cure Notice pursuant to the instructions set out in this Cure Notice, you shall be forever barred from objecting to such Cure Amount, and you shall be deemed to consent to such Cure Amount.

9. The presence of a contract or agreement on Exhibit 1 attached hereto does not constitute an admission that such contract or agreement is an executory contract, and does not constitute a representation that such contract or agreement will be assumed and assigned to any successful purchaser. The Trustee reserves all of his rights, claims, and causes of action with respect to the contracts and agreements listed on Exhibit 1 attached hereto.

10. This Cure Notice is qualified in its entirety by the Motion.

Dated: April ___, 2025

COZEN O'CONNOR

/s/

Mark E. Felger (No. 3919)
Gregory F. Fischer (No. 5269)
1201 North Market Street, Suite 1001
Wilmington, DE 19801
Telephone: (302) 295-2000
Facsimile: (302) 295-2013

Proposed Counsel for the Trustee

Exhibit 1